

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

In re: LAKE DISTRICT, LLC

Case No. 23-21496- JDL

Debtor.

Chapter 11

**APPLICATION OF DEBTOR FOR ORDER
APPROVING EMPLOYMENT OF GLANKLER BROWN PLLC
AS COUNSEL FOR THE DEBTOR-IN-POSSESSION**

Lake District, LLC., a Delaware limited liability company, (“Lake District” or “Debtor”), debtor and debtor-in-possession, pursuant to § 327 and § 328 of the Bankruptcy Code and Bankruptcy Rule 2014, for its application to employ attorneys in this cause, respectfully states as follows:

1. On March 24, 2023 (the "Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtor is now operating its business and managing its property as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. The Debtor is an Delaware limited liability company. The Debtor’s primary business is ownership and development of a multipurpose commercial, retail and residential real estate project located in Lakeland, Tennessee known as The Lake District.

3. It is necessary for the Debtor to retain legal counsel to render legal services relating to the reorganization proceeding, including, but not limited to, the preparation of the Petition, Schedules, Statement of Affairs, reports required, the preparation of the motions and applications required in the administration of this reorganization proceeding, the formulation and

submission to creditors of a plan of reorganization and/or motions to approve the sale of assets, and rendering legal advice with respect to the various matters arising during the course of the Chapter 11 case.

4. The Debtor has concluded that its interests would best be served by the retention of Michael P. Coury and the law firm of Glankler Brown, PLLC, Suite 400, 6000 Poplar Avenue, Memphis, Tennessee 38119 as counsel to the Debtor to render the legal services set forth above in connection with the instant case as well as any additional legal services as may be required from time to time.

5. Applicant has selected Mr. Coury and the law firm of Glankler Brown, PLLC for the reason that they have had considerable experience in matters of this character, and applicant believes that they are well qualified to represent it as counsel in this case.

6. To the best of Applicant's knowledge, Mr. Coury and the law firm of Glankler Brown, PLLC and its attorneys have no connection with the debtor, with its creditors, accountants, or any other party in interest, or their respective attorneys, except that as set forth in the Declaration of Michael P. Coury.

7. Attached hereto as Exhibit "1" is the Declaration of Michael P. Coury, attorney with said firm, indicating that, except as set forth above, said firm is not connected with the Debtor, its creditors, or other parties in interest except as may be noted therein, nor does such firm represent or hold any interest adverse to the Debtor in the matters upon which it is to be engaged.

8. Applicants have agreed to employ said firm and its attorneys and said attorneys have agreed to represent Applicant on an hourly rate basis. Said arrangement is subject to Court review upon proper Applications for Compensation by Applicants.

9. The professional services to be rendered by Mr. Coury and the law firm of Glankler Brown, PLLC are to represent Applicants in all aspects of the chapter 11 case.

10. The persons likely to be involved in this representation and their respective hourly rates are as follows:

Michael P. Coury	Member	\$500.00
Ricky L. Hutchens	Associate	\$350.00
Mandi Benson	Paralegal	\$220.00

These rates are subject to being adjusted annually in accordance with the firm's billing practices.

11. No previous application for the relief requested has been made to this or any other Court.

12. Applicant relies upon the accompanying Declaration of Michael P. Coury.

WHEREFORE, the Debtor prays that employment of Michael P. Coury and the law firm of Glankler Brown PLLC and its attorneys, as counsel to the Debtor in this case under chapter 11 of the Bankruptcy Code be approved by the Court *nunc pro tunc* as of March 24, 2023.

GLANKLER BROWN, PLLC

By /s/ Michael P. Coury
Michael P. Coury (TN #7002)
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Proposed Attorneys for Lake District, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was provided to all parties on matrix via U.S. mail and electronically to parties receiving notice through the Court's ECF filing system this 12th of April, 2023.

/s/ Michael P. Coury

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